

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARCON SOLUTIONS, LLC,

Plaintiff/Counterclaim Defendant,

v.

EAST 29th STREET, LLC, and ESPAIS
PROMOCIONS IMMOBILARIES EPI, S.A.,

Defendants/Counterclaimants,

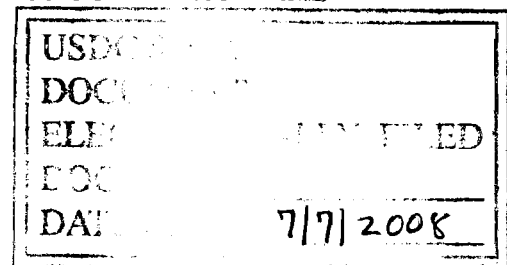
v.

MICHAEL FALKE and MARK GEMIGNANI

Additional Counterclaim Defendants.

No. 08 CV 02050 (RMB)

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COUNTERCLAIM DEFENDANTS'
MICHAEL FALKE AND MARK
GEMIGNANI'S MOTION TO
DISMISS COUNTERCLAIMS**



WHEREAS, Counterclaim Defendants Michael Falke and Mark Gemignani have moved pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6) to dismiss the counterclaims asserted by Defendants/Counterclaimants East 29th Street, LLC and Espais Promocions Inmobiliarias EPI, S.A (the "Motion"); and

WHEREAS, the Defendants/Counterclaimants' opposition to the Motion is currently due on July 9, 2008 and the Counterclaim Defendants' reply is currently due July 16, 2008; and

WHEREAS, the Counterclaim Defendants have consented to a one-week adjournment of the date by which Defendants/Counterclaimants are required to oppose the Motion and no previous requests for extension have been made on the Motion.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties herein, that:

1. Defendants/Counterclaimants' opposition to Counterclaim Defendants' Motion shall be served so as to be received by July 16, 2008;

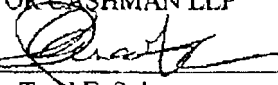
2. Counterclaim Defendants' reply, if any, shall be served so as to be received by July 23, 2008.

3. This Stipulation may be executed in counterparts, each of which shall be considered to be an original instrument. Fax signatures shall be deemed to be originals.

Dated: New York, New York
July 2, 2008


4. Existing discovery timetable NOT affected by extension

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*Attorneys for Counterclaim Defendants Michael
Falke and Mark Gemignani*

SO ORDERED:
Date: July 7, 2008


The Honorable Richard M. Berman
United States District Court Judge